Exhibit 326
(Filed Under Seal)

** H I G H L Y C O N F I D E N T I A L **

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 1:15-cv-07488-CM

----------x

IN RE NAMENDA DIRECT PURCHASER ANTITRUST LITIGATION

----------x

August 18, 2017

8:59 a.m.

Videotaped Deposition of FOREST LABORATORIES, LLC; ACTAVIS, PLC; FOREST LABORATORIES, INC.; and FOREST LABORATORIES HOLDINGS LTD., by JUNE K. BRAY, taken by Plaintiffs, pursuant to Rule 30(b)(6) Notice, held at the offices of White & Case LLP, 1221 Avenue of the Americas, New York, New York, before Todd DeSimone, a Registered Professional Reporter and Notary Public of the State of New York.

Q. I will ask it a little bit differently.

Why didn't Forest simply tell the FDA in this letter that it was pursuing the development plan to determine the safe and effective use of memantine hydrochloride for autism with or without a written request?

MR. JOHNSON: Objection.

A. When the PPSR was submitted to the FDA, it was to also obtain their agreement that there is an unmet medical need, and that memantine would be an appropriate product to develop and evaluate for the safe and effective treatment in children with autism where there is a significant unmet medical need.

Q. So could Forest have pursued a development plan and conducted clinical trials on its own without the PWR, without the written request from FDA?

MR. JOHNSON: Objection.

A. Yes.

Q. Could Forest have pursued a development plan and conducted clinical

trials in adults for the treatment of autism and then submitted a supplement to its NDA to add an indication for Namenda for the treatment of autism in adults?

MR. JOHNSON: Objection.

A. I suppose that could have occurred, but autism is, based on my understanding, really is very impactful on children and their development.

Q. So I think you're sort of answering my question, but let me try and ask you, are you saying, then, that Forest believed that there was more merit to the treatment of autism in children than there would be in adults, and that's why it chose to submit a pediatric written request?

A. So let me -- let me go back to this request. What you did not read into the record is the fact that there were several publications with regard to the off-label use of memantine for the treatment of children with autism, which was brought to our attention by physicians who were actually interested in having more data with regard to the safe and effective

use of memantine for the treatment of autism in children, and the publications that were referenced in the cover letter spoke to the fact that the product was in fact being used in children.

So that was really what precipitated and prompted, you know, our interest in, you know, taking a look at a product that was in fact being used off-label for the treatment of -- the use of memantine for the treatment of autistic spectrum disorder, which is why we pursued moving forward with this.

To the best of my knowledge, we were never contacted by physicians who were treating adults with autism with memantine, it was only in children.

Q. Is that the only reason why Forest submitted, or sought, rather, to receive a pediatric written request from the FDA?

MR. JOHNSON: Objection.

A. I'm not sure I understand the question.

Q. So let me go back a little bit,